

**LIMITED-SOURCES JUSTIFICATION
FEDERAL SUPPLY SCHEDULE
FAR SUBPART 8.405-6
(NOTE: No fields should be left blank)**

I recommend the use of limited sources procedures for the acquisition of the following supplies or services available under Federal Supply Schedules (FSS). This acquisition is conducted under the authority of the Multiple Award Schedule (MAS) Program--Title III of the Federal Property and Administrative Services Act of 1949 (41 U.S.C. 251, et seq.) and Title 40 U.S.C. 501, Services for Executive Agencies.

1. IDENTIFICATION OF THE AGENCY AND THE CONTRACTING ACTIVITY:

Department of the Treasury, Internal Revenue Service, Office of Treasury Procurement Services, Operations Support
Branch OS:A:P:T:B

2. NATURE AND/OR DESCRIPTION OF THE ACTION BEING APPROVED:

This requirement is being conducted under the Logical Follow-On Authority for pension benefit consulting services for a Due Process and Debt project. Labor Hour Order against GSA Schedule Contract GS-10F-0083L. The period of performance is twenty four (24) months from date of award. No option periods will be included in the task order.

3. DESCRIPTION OF SUPPLIES OR SERVICES AVAILABLE FROM FSS

The Treasury, Office of District of Columbia Pensions (ODCP) requires contractor pension benefit consulting services for support with a Due Process and Debt project. The Contractor shall track all incoming and outgoing correspondence with annuitants regarding their change in benefits and overpayments, and shall conduct research and draft correspondence to respond to annuitant requests. In addition, the Contractor shall provide the Government with copies of all correspondence. Generally, the Contractor shall do the following:

- Facilitate meetings, prepare meeting agendas, status reports, and meeting minutes for weekly status meetings with the Government to report progress against the Contractor's project management plan and to report the results of work performed to date.
- Track incoming and outgoing correspondence with annuitants, including logging, scanning, and filing.
- Prepare and print acknowledgement letters upon receipt of an annuitant's request for reconsideration or appeal of the benefit change.
- Prepare and print demand letters and notice of offset letters notifying an annuitant of the overpayment amount and repayment options.
- Prepare and print acknowledgement letters upon receipt of an annuitant's request for reconsideration, appeal, or waiver and/or compromise of the overpayment amount.
- Research the basis of annuitants' requests for reconsideration and appeals of the benefit change.
- Research the basis of annuitants' requests for reconsideration, appeals, and waiver and/or compromise of the overpayment amount.
- Track overpayments and collections.
- Prepare and perform calculations, as needed.
- Draft responses for Government review.
- Prepare and print correspondence for mailings, with appropriate enclosures.
- Prepare mailings to include stuffing and addressing envelopes to individual annuitants, ensuring annuitants receive the correct information and appropriate enclosures; ensure that there is no breach of Personally Identifiable Information.
- Staff a government-provided call center with appropriately trained and knowledgeable staff who will respond to telephone calls from annuitants with questions regarding the processes for submitting a request for reconsideration or appeal of the benefit change, or a request for reconsideration, appeal, or waiver and/or compromise of the overpayment amount.
- Prepare storage media with all incoming and outgoing correspondence.

The period of performance is twenty four (24) months from date of award (ending approximately March 2017). No option periods will be included in the task order.

4. REQUISITION NO. DCP14004	5. NAME(S) OF PROPOSED FSS SOURCE(S) Deloitte Consulting LLP 1725 Duke Street Alexandria, VA, 22314-3456 GS-10F-0083L		
6. COST ESTIMATE [REDACTED]			
REQUIREMENT OFFICE CERTIFICATION			
I certify that the attached justification is accurate, and complete to support the recommendation for limited sources justification and approval.			
7. TECHNICAL/REQUIREMENT PERSONNEL (Name & Title) DAVID C. ROTH TECHNICAL OPERATIONS MANAGER	(Signature) [Signature]	(Phone No.) 202-622-0192	(Date) 1/26/15
SMALL BUSINESS CERTIFICATION			
I have conducted a search of vendor files from GSA Advantage/Schedules e-Library, etc., to locate potential FSS small businesses for this procurement. If any were found, a list is attached.			
8. SMALL BUSINESS SPECIALIST (Name and Title) LaTonya Richardson	(Signature) LLGLB <small>Digitally signed by LLGLB DN: cn=LLGLB, email=Latonya.D.Richardson@irs. gov Date: 2015.01.26 13:21:24 -05'00'</small>	(Phone No.) 240-613-8311	(Date)

I certify that this submission is accurate, and complete to the best of my knowledge and belief. This certification will serve as approval, unless action exceeds \$650K.

9. ASSIGNED CONTRACTING OFFICER (Name) David Gill	(Signature) YBYLB <small>Digitally signed by YBYLB DN: cn=YBYLB, email=David.Gill@irs.gov Date: 2015.01.26 11:57:30 -05'00'</small>	(Phone No.) 240-613-8134	(Date) 1/26/15
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10. FEDERAL ACQUISITION REGULATION 8.405-6

TITLE III OF THE FEDERAL PROPERTY AND ADMINISTRATIVE SERVICES ACT OF 1949 (41 U.S.C. 251, ET SEQ.) AND TITLE 40 U.S.C. 501 Just check applicable block – See FAR for the description of the authority, application and limitations for its use.

(place "X" in appropriate box and complete rest of form)

	FAR 8.405-6(a)(1)(i)(A) – An urgent and compelling need exists, and following the procedures would result in unacceptable delays.
	FAR 8.405-6(a)(1)(i)(B) – Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized.
X	FAR 8.405-6(a)(1)(i)(C) – In the interest of economy and efficiency, the new work is a logical follow-on to an original Federal Supply Schedule order provided that the original order was placed in accordance with the applicable Federal Supply Schedule ordering procedures. The original order or BPA must not have been previously issued under sole-source or limited-sources procedures.
	FAR 8.405-6(b)(1) – The item is peculiar to one manufacturer (e.g., a particular brand name, product, or a feature of a product, peculiar to one manufacturer). A brand name item, whether available on one or more schedule contracts, is an item peculiar to one manufacturer.

11. JUSTIFICATION

A. DEMONSTRATION THAT THE PROPOSED FSS CONTRACTOR'S UNIQUE QUALIFICATIONS OR THE NATURE OF THE ACQUISITION REQUIRES USE OF THE AUTHORITY CITED.

Deloitte's experience performing previous pension benefit consulting work makes the company uniquely qualified to perform logically related pension consulting work. Deloitte was selected as the contractor representing the best value based on Technical / Management Experience that was evaluated as superior to competitors and a reasonable price.

The currently needed contractor support Due Process and Debt is a continuation of previous work implementing corrective actions to address pension program audit findings. Having the same contractor provide consulting services with Due Process and Debt is in the interest of economy and efficiency because over the past year Deloitte has already:

- Reviewed relevant annuitant case files and recalculated annuitant benefits under previous GSA task order 001 / GS-10F-0083L for the Lookback COLA Correction 1 at a cost of \$750,332 and over 5,000 labor hours, and;
- Prepared correspondence to affected annuitants and addressed annuitant questions about the corrective actions via a call center under previous GSA Task Order 003 / GS-10F-0083L for Communications at a cost of \$799,470 and over 3,000 labor hours.

No other contractor has reviewed these specific case files or has knowledge previous annuitant inquiries.

The Due Process and Debt regulations that ODCP must follow (31 CFR Part 29) necessitate timely responses to annuitants who exercise their due process rights. As such, prior knowledge of the corrective actions and the applicable regulations is required to support ODCP in this endeavor.

For the 2nd year of the period of performance, 31 CFR Part 29, Subparts D and E, outlines the due process and debt collection requirements. For an individual annuitant, the processes run sequentially (not concurrently). For example, an annuitant must submit a request for reconsideration and the government (i.e. ODCP) must send a written response before the annuitant can submit an appeal. Annuitants have 60 days from the date of the benefit change letter to submit a request for reconsideration. The government (i.e. ODCP) has no statutory time limitation for responding, but ODCP is targeting 90 days. Then annuitants have 60 days to appeal. The government (i.e. ODCP) again has no statutory time limitation for responding, but ODCP is targeting 120 days. (The Office of General Counsel reviews appeals before they go out and an estimate of their review time is included in the 120 day estimate). If each of these items goes to the maximum length, that's 330 calendar days just for the due process for the benefit change. The demand letter for debt collection cannot be sent until the annuitant's due process rights for the benefit change have expired. The timeframe for debt

collection can run longer due to the demand letter and the waiver/compromise processes. Please see the attached flowchart which illustrates the full process for both benefits changes and debt collection.

B. DETERMINATION BY OTHE ORDERING ACTIVITY CONTRACTING OFFICER THAT THE ORDER REPRESENTS THE BEST VALUE CONSISTENT WITH 8.404(d).

Deloitte won the previously logically related work on the basis of competition awarded under contract number GS-10F-0083L. Continuing to use Deloitte will achieve the best value because the Government will benefit from Deloitte's qualifications and avoid the substantial duplication of cost that would occur if a new contractor needed to become familiar with these annuitant case files.

C. DESCRIBE THE MARKET RESEARCH THAT WAS CONDUCTED, OR A STATEMENT OF THE REASON MARKET RESEARCH WAS NOT CONDUCTED, AND THE RESULTS OF THE RESEARCH (E.G., SEARCH ON E-LIBRARY AT [HTTP://WWW.GSA.GOV/FSS](http://www.GSA.GOV/FSS); HISTORICAL ORDERING INFORMATION, FEDBIZOPPS SYNOPSIS). SYNOPSIS IS NOT REQUIRED FOR FSS PROCUREMENTS, BUT MAY BE USED. ALSO, LIST ANY FSS SOURCES THAT EXPRESSED AN INTEREST IN WRITING IN THE ORDER AND THE RESULTS OF THAT INTEREST.

Four vendor responses were received when the logically related previous work was competed. Responses were submitted by [REDACTED] and Deloitte Consulting LLP. Treasury's evaluation determined that Deloitte was the best value.

D. ANY OTHER FACTS SUPPORTING THE JUSTIFICATION:

Continued contractor support is critical to efficiently and effectively addressing audit findings from the Treasury, Inspector General regarding Treasury's management of the District of Columbia pension program.

A Performance Work Statement (PWS) and an Independent Government Cost Estimate IGCE) have been developed.

E. LIST THE ACTIONS THE BUREAU WILL TAKE TO REMOVE OR OVERCOME ANY BARRIERS THAT LED TO THE RESTRICTED CONSIDERATION BEFORE ANY SUBSEQUENT ACQUISITIONS FOR SIMILAR SUPPLIES OR SERVICES.

Acquisition planning has begun for a new, competitive long-term procurement vehicle for additional pension benefit consulting requirements not covered by this justification.

F. STATEMENT THAT REQUIREMENT DOES NOT RESULT FROM A LACK OF PLANNING OR THE EXPIRATION OF FUNDS.

This requirement does not result in a lack of planning or expiration of funds. ODCP and the Office of Procurement meet have been communicating regularly to discuss advance acquisition planning. Further, ODCP's budget authority is derived from mandatory indefinite appropriations and the expiration of funds is not the impetus for this acquisition.

12. ADDITIONAL APPROVALS

OVER \$650K	BUREAU COMPETITION ADVOCATE <i>(Name & Title)</i> SYDNEY C. BROACH Associate Director, (SCR-CO) AWSS, Employee Support Services	[<input checked="" type="checkbox"/>] APPROVE [] DISAPPROVE	(Signature) Sydney C. Broach <div style="font-size: small; margin-top: 5px;"> Digitally signed by Sydney C. Broach DN: cn=US, o=U.S. Government, ou=Department of the Treasury, ou=Internal Revenue Service, ou=People, serialNumber=BA2965, cn=Sydney C. Broach Date: 2015.01.27 15:09:12 -05'00' </div>	(Phone No.) 616-250-5545
				(Date)
OVER \$12.5M	HEAD OF THE CONTRACTING ACTIVITY <i>(Name & Title)</i>	[] APPROVE [] DISAPPROVE	(Signature)	(Phone No.)
				(Date)
OVER \$62.5M	SENIOR PROCUREMENT EXECUTIVE <i>(Name & Title)</i>	[] APPROVE [] DISAPPROVE	(Signature)	(Phone No.)
				(Date)

NOTE: Each review must be preceded by lower level approval(s), e.g., over \$62.5 million all approvals are required. IN NO CASE WILL AN INDIVIDUAL SIGN MORE THAN ONE APPROVAL LEVEL.

CONTROL NO. FSS 2015-12